

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party  
Plaintiff.

Case No. 22-cv-10904 (JSR)

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JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party  
Defendant.

**DECLARATION OF FELICIA H. ELLSWORTH IN SUPPORT OF JPMORGAN  
CHASE BANK, N.A.’s MEMORANDUM OF LAW IN OPPOSITION TO UNITED  
STATES VIRGIN ISLANDS’ MOTION TO EXCLUDE EXPERT OPINIONS OF  
KIMBERLY MEHLMAN-OROZCO, JOSEPH FONESCA, AND CARLYN IRWIN**

Pursuant to 28 U.S.C. § 1746, I, Felicia H. Ellsworth, declare under penalty of perjury as follows:

1. I am a member in good standing of the bar of the Commonwealth of Massachusetts. I am one of the attorneys representing Defendant JPMorgan Chase Bank, N.A. (“JPMC”) in the above-captioned action and have been admitted to this Court pro hac vice. I am a Partner with the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts 02109. I am familiar with the facts set forth herein, and if called as a witness, I could and would competently testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of excerpts of the transcript from the June 30, 2023, Deposition of Kimberly Mehlman-Orozco, designated confidential pursuant to the Protective Order in this matter and filed under seal.
3. Attached as Exhibit 2 is a true and correct copy of excerpts of the transcript from the July 6, 2023, Deposition of Joseph Fonesca, designated confidential pursuant to the Protective Order in this matter and filed under seal.
4. Attached as Exhibit 3 is a true and correct copy of excerpts of the transcript from the July 6, 2023, Deposition of Carlyn Irwin, designated confidential pursuant to the Protective Order in this matter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 25, 2023

/s/ Felicia Ellsworth

Felicia H. Ellsworth